

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Wayne E. Miller
Debtor 1

Federal Home Loan Mortgage Corporation, as Trustee for the Benefit of Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2020-1

Movant(s)

v.

Wayne E. Miller
Janell L. Miller (Non-Filing Co-Debtor)
Respondent(s)
Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
Additional Respondent

Chapter 13

Case No. 1:22-BK-02192-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 26

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Wayne E. Miller, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Upon information and belief, the averments as stated in Paragraph 4 are admitted.
5. Admitted.
6. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in Paragraph 6; therefore, they are denied.

7. Admitted.
8. Upon information and belief, the averment as stated in Paragraph 8 is admitted.
9. Upon information and belief, the averment as stated in Paragraph 9 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

10. Upon information and belief, the averment as stated in Paragraph 10 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

11. Paragraph 11 contains a conclusion of law to which no response is required.
12. Paragraph 12 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: April 28, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Friday, April 28, 2023, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Brian Nicholas, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire